

**Appl. No.** : **09/673,161**  
**Filed** : **April 16, 2001**

## **II. REMARKS**

Claims 24-46 were pending in this application. Claim 24 has been amended as stated above. Claims 25-46 remain as previously pending. Claims 47-52 are newly added claims. Thus, Claims 24-52 remain pending.

Attached hereto is Exhibit 1 captioned "Version with Markings to Show Changes Made" and listing all of the changes made to the currently pending claims. Also attached hereto is Exhibit 2 captioned "Clean Version of the Pending Claims" and listing all of the pending claims as amended.

In the Office Action mailed January 14, 2004, the Examiner rejected Claims 24-46. In particular, the Examiner rejected Claims 24-29, 34, 35, and 45 under 35 U.S.C. § 102(e) as being anticipated by U.S. Patent No. 6,430,177 to Luzeski, et al. ("Luzeski"). The Examiner also rejected Claims 30-33, 36-39, 42-44, and 46 under 35 U.S.C. § 102(e) as being anticipated by U.S. Patent No. 6,430,174 to Jennings, et al. ("Jennings"). In addition, the Examiner rejected Claims 40 and 41 under 35 U.S.C. § 103(a) as being unpatentable over Jennings in view of Luzeski.

By the foregoing amendments, Applicant has amended Claim 24 and has added new Claims 47-52. Thus, Applicant respectfully requests reconsideration of Claim 24 as amended, Claims 25-46 as originally filed, and Claims 47-52 as added.

### **A. REJECTION OF CLAIMS 24-29, 34, 35, AND 45 UNDER 35 U.S.C. §102(e)**

The Examiner rejected Claims 24-29, 34, 35, and 45 under 35 U.S.C. § 102(e) as being anticipated by Luzeski.

#### **1. Claim 24**

With respect to Claim 24, the Examiner asserts that Luzeski teaches "a method of manipulating electronically generated messages belonging to at least two of the following messages types: e-mail, fax, video, pager, SMS, voice mail; comprising handling the electronically generated messages using a single messaging application."

Applicant respectfully traverses this rejection and the Examiner's characterization of the cited reference. Claim 24 has been amended, however, to clarify Applicant's invention. This amendment was not made for patentability purposes, and Applicant believes that Claim 24 would satisfy the statutory requirements for patentability without the entry of the amendment.

**Appl. No.** : **09/673,161**  
**Filed** : **April 16, 2001**

Luzeski does not disclose "handling the electronically generated messages using a single messaging application, wherein said single messaging application is a user application." In the Abstract, cited by the Examiner, Luzeski discloses a Universal Messaging System wherein the messages are processed by a Web platform in which a server application manages a web browser's session. Luzeski does not disclose the use of a single messaging application that is a user application.

Thus, Applicant respectfully submits that Luzeski fails to teach or suggest every element of amended Claim 24, and Applicant respectfully requests that the rejection of Claim 24 be withdrawn.

**2. Claim 34**

With respect to Claim 34, the Examiner rejected Claim 34 for "similar reasons as stated above." Applicant respectfully traverses this rejection and the Examiner's characterization of the cited reference. Claim 34 is believed to be patentable for the same reasons stated above. Thus, Applicant respectfully submits that Luzeski fails to teach or suggest every element of any of Claim 34, and Applicant respectfully requests that the rejection of Claim 34 be withdrawn.

**3. Claim 35**

With respect to Claim 35, the Examiner rejected Claim 35 for "similar reasons as stated above." Applicant respectfully traverses this rejection and the Examiner's characterization of the cited reference. Claim 35 is believed to be patentable for the same reasons stated above. Thus, Applicant respectfully submits that Luzeski fails to teach or suggest every element of any of Claim 35, and Applicant respectfully requests that the rejection of Claim 35 be withdrawn.

**4. Claim 45**

With respect to Claim 45, the Examiner rejected Claim 45 for "similar reasons as stated above." Applicant respectfully traverses this rejection and the Examiner's characterization of the cited reference. Claim 45 is believed to be patentable for the same reasons stated above. Thus, Applicant respectfully submits that Luzeski fails to teach or suggest every element of any of Claim 45, and Applicant respectfully requests that the rejection of Claim 45 be withdrawn.

**Appl. No.** : **09/673,161**  
**Filed** : **April 16, 2001**

**5. Claim 25**

Claim 25, which depends from Claim 24 and includes all of the limitations of Claim 24, is believed to be patentable for the same reasons stated above with respect to Claim 24, and because of the additional limitations set forth therein. Since the prior art reference fails to teach or suggest every element of Claim 25, Applicant respectfully requests that the rejection of Claim 25 be withdrawn. In addition, Applicant traverses the Examiner's rejections with respect to Claim 25 as follows.

With respect to Claim 25, the Examiner asserts that Luzeski teaches the "method of manipulating electronically generated messages wherein the single messaging application handles attributes of messages, these attributes being shared by all of the message types."

Applicant respectfully traverses this rejection and the Examiner's characterization of the cited reference. For example, Luzeski does not disclose a single messaging application that handles attributes of messages, these attributes being shared by all of the message types. Applicant respectfully submits that Luzeski fails to teach or suggest every element of Claim 25, and Applicant respectfully requests that the rejection of Claim 25 be withdrawn.

**6. Claim 26**

Claim 26, which depends from Claim 25 and includes all of the limitations of Claim 25, is believed to be patentable for the same reasons stated above with respect to Claim 25, and because of the additional limitations set forth therein. Since the prior art reference fails to teach or suggest every element of Claim 26, Applicant respectfully requests that the rejection of Claim 26 be withdrawn. In addition, Applicant traverses the Examiner's rejections with respect to Claim 26 as follows.

With respect to Claim 26, the Examiner asserts that Luzeski teaches the "method of manipulating electronically generated messages wherein the single messaging application invokes or applies operations to the attributes of the messages, these operations being applicable to all the message types which are capable of being manipulated by the single messaging application."

Applicant respectfully traverses this rejection and the Examiner's characterization of the cited reference. For example, Luzeski does not disclose "invokes or applies operations to the attributes of the messages, these operations being applicable to all

**Appl. No.** : **09/673,161**  
**Filed** : **April 16, 2001**

the message types." In Col. 13, Lines 63-67, cited by the Examiner, Luzeski discloses "[i]f the user then logs into the system using the Web interface, the custom Web application (e.g., browser) can use the inbox information to display the offer header on the screen in a manner different from new offers." In Col. 14, Lines 1-4, cited by the Examiner, Luzeski discloses "[p]rohibiting or enabling certain operations on a message type or user basis (such as the deletion of subscription containers) is a custom client function." Luzeski does not disclose invoking or applying operations to the attributes of the messages, these operations being applicable to all the message types. Thus, Applicant respectfully submits that Luzeski fails to teach or suggest every element of Claim 26, and Applicant respectfully requests that the rejection of Claim 26 be withdrawn.

**7. Claim 27**

Claim 27, which depends from Claim 26 and includes all of the limitations of Claim 26, is believed to be patentable for the same reasons stated above with respect to Claim 26, and because of the additional limitations set forth therein. Since the prior art reference fails to teach or suggest every element of Claim 27, Applicant respectfully requests that the rejection of Claim 27 be withdrawn. In addition, Applicant traverses the Examiner's rejections with respect to Claim 27 as follows.

With respect to Claim 27, the Examiner asserts that Luzeski teaches the "method of manipulating electronically generated messages wherein the messaging application interfaces with one or more databases of loadable software code modules relating to at least one of the message type specific attributes and operations."

Applicant respectfully traverses this rejection and the Examiner's characterization of the cited reference. For example, Luzeski does not disclose "databases of loadable software code modules relating to at least one of the message type specific attributes and operations." In Col. 5, Lines 46-62, cited by the Examiner, Luzeski discloses "[t]he Web platform includes an applet server (e.g., for providing Java applets to the Web-based client); a Content Manager Application (i.e., an application designed to receive information from content providers, format information into multimedia containers and distribute these containers to the Universal Messaging system via CMC calls); and an NT based Internet server, such as e.g., an IIS server. . . . Web platform also includes or is operatively coupled to a first database (Offer Database) and a second database

**Appl. No.** : 09/673,161  
**Filed** : April 16, 2001

(Subscription Database), where 'offer' refers to an e-mail based advertisement and 'subscription' refers to 'news' from a content provider. In addition, Web server includes a communications object/address book and a Sockets Interface." Luzeski does not disclose modules relating to at least one of the message type specific attributes and operations. Thus, Applicant respectfully submits that Luzeski fails to teach or suggest every element of Claim 27, and Applicant respectfully requests that the rejection of Claim 27 be withdrawn.

**8. Claim 28**

Claim 28, which depends from Claim 27 and includes all of the limitations of Claim 27, is believed to be patentable for the same reasons stated above with respect to Claim 27, and because of the additional limitations set forth therein. Since the prior art reference fails to teach or suggest every element of Claim 28, Applicant respectfully requests that the rejection of Claim 28 be withdrawn. In addition, Applicant traverses the Examiner's rejections with respect to Claim 28 as follows.

With respect to Claim 28, the Examiner asserts that Luzeski teaches the "method of manipulating electronically generated messages, wherein a new messaging type can be dynamically added to a system whilst the system is fully operational by adding new loadable software code modules to one or more databases."

Applicant respectfully traverses this rejection and the Examiner's characterization of the cited reference. For example, Luzeski does not disclose "wherein a new messaging type can be dynamically added to a system" nor does Luzeski disclose adding a new messaging type to a system, while the system is fully operational." In Col. 5, Lines 32-37, cited by the Examiner, Luzeski discloses elements of its messaging platform. In Col. 6, Lines 6-10, cited by the Examiner, Luzeski discloses "[t]he CMC API layer and its supporting components provides a messaging interface library" that "does not require the use of any specific messaging interface library." Luzeski does not disclose "wherein a new messaging type can be dynamically added to a system whilst the system is fully operational by adding new loadable software code modules to one or more databases." Thus, Applicant respectfully submits that Luzeski fails to teach or suggest every element of Claim 28, and Applicant respectfully requests that the rejection of Claim 28 be withdrawn.

**Appl. No.** : **09/673,161**  
**Filed** : **April 16, 2001**

**9. Claim 29**

Claim 29, which depends from Claim 26 and includes all of the limitations of Claim 26, is believed to be patentable for the same reasons stated above with respect to Claim 26, and because of the additional limitations set forth therein. Since the prior art reference fails to teach or suggest every element of Claim 29, Applicant respectfully requests that the rejection of Claim 29 be withdrawn. In addition, Applicant traverses the Examiner's rejections with respect to Claim 29 as follows.

With respect to Claim 29, the Examiner asserts that Luzeski teaches the "method of manipulating electronically generated messages wherein all user interface code is accessed through a database using loadable software code modules."

Applicant respectfully traverses this rejection and the Examiner's characterization of the cited reference. For example, Luzeski does not disclose a method where "user interface code is accessed through a database using loadable software code modules." In Col. 8, Lines 11-20, cited by the Examiner, Luzeski discloses "[t]he Session Manager is implemented as a server library whose primary clients are the applet server and Content Manager running on one or more Internet servers and interfacing via the Router, and Web Server. . . The Session Manager links to the CMC layer using a single connection." Luzeski does not disclose that "user interface code is accessed through a database using loadable software code modules." Thus, Applicant respectfully submits that Luzeski fails to teach or suggest every element of Claim 29, and Applicant respectfully requests that the rejection of Claim 29 be withdrawn.

**B. REJECTION OF CLAIMS 30-33, 36-39, 42-44, AND 46 UNDER 35 U.S.C. §102(e)**

The Examiner rejected Claims 30-33, 36-39, 42-44, and 46 under 35 U.S.C. § 102(e) as being anticipated by Jennings.

**1. Claim 30**

With respect to Claim 30, the Examiner asserts that Jennings "shows a software program for manipulating messages of a given type, comprising loadable software code modules capable of interfacing with at least a single messaging application, the loadable software code modules relating to at least one of message type specific attributes and operations and the single messaging application being operable to

**Appl. No.** : **09/673,161**  
**Filed** : **April 16, 2001**

manipulate electronically generated messages belonging to at least two of the following message types: e-mail, fax, video, pager, SMS and voicemail.”

Applicant respectfully traverses this rejection and the Examiner’s characterization of the cited reference. For example, Jennings does not disclose “loadable software code modules relating to at least one of message type specific attributes and operations.” In Col. 5, Lines 60-67, cited by the Examiner, Jennings discloses “the communication system supports protocols and languages supported to extend to the Handheld Device Transfer Protocol (HDTP) and the Handheld Device Markup Language (HDML). JAVA enabled phones may also support these protocols and languages. Thus, when accessing the communication system, the JAVA enabled phones provide functionality somewhat comparable to that provided by a multimedia enabled computer.” Jennings does not disclose loadable software code modules relating to at least one of message type specific attributes and operations. Thus, Applicant respectfully submits that Jennings fails to teach or suggest every element of Claim 30, and Applicant respectfully requests that the rejection of Claim 30 be withdrawn.

**2. Claim 36**

With respect to Claim 36, the Examiner rejected Claim 36 for “similar reasons as stated above.” Applicant respectfully traverses this rejection and the Examiner’s characterization of the cited reference. Claim 36 is believed to be patentable for the same reasons stated above. Thus, Applicant respectfully submits that Jennings fails to teach or suggest every element of any of Claim 36, and Applicant respectfully requests that the rejection of Claim 36 be withdrawn.

**3. Claim 46**

With respect to Claim 46, the Examiner rejected Claim 46 for “similar reasons as stated above.” Applicant respectfully traverses this rejection and the Examiner’s characterization of the cited reference. Claim 46 is believed to be patentable for the same reasons stated above. Thus, Applicant respectfully submits that Jennings fails to teach or suggest every element of any of Claim 46, and Applicant respectfully requests that the rejection of Claim 46 be withdrawn.

**Appl. No.** : **09/673,161**  
**Filed** : **April 16, 2001**

**4. Claim 31**

Claim 31, which depends from Claim 30 and includes all of the limitations of Claim 30, is believed to be patentable for the same reasons stated above with respect to Claim 30, and because of the additional limitations set forth therein. Since the prior art reference fails to teach or suggest every element of Claim 31, Applicant respectfully requests that the rejection of Claim 31 be withdrawn. In addition, Applicant traverses the Examiner's rejections with respect to Claim 31 as follows.

With respect to Claim 31, the Examiner asserts that Jennings "shows the software program wherein the software program is dynamically loadable plug-in to the single messaging application."

Applicant respectfully traverses this rejection and the Examiner's characterization of the cited reference. For example, Jennings does not disclose a software program that is "a dynamically loadable plug-in to the single messaging application." In Col. 5, Lines 60-67, cited by the Examiner, Jennings discloses "the communication system supports protocols and languages supported to extend to the Handheld Device Transfer Protocol (HDTP) and the Handheld Device Markup Language (HDML). JAVA enabled phones may also support these protocols and languages. Thus, when accessing the communication system, the JAVA enabled phones provide functionality somewhat comparable to that provided by a multimedia enabled computer." Jennings does not disclose a dynamically loadable plug-in to the single messaging application. Thus, Applicant respectfully submits that Jennings fails to teach or suggest every element of Claim 31, and Applicant respectfully requests that the rejection of Claim 31 be withdrawn.

**5. Claim 43**

Claim 43, which depends from Claim 42 and includes all of the limitations of Claim 42, is believed to be patentable for the same reasons stated below with respect to Claim 42, and because of the additional limitations set forth therein. Since the prior art reference fails to teach or suggest every element of Claim 43, Applicant respectfully requests that the rejection of Claim 43 be withdrawn. In addition, Applicant traverses the Examiner's rejections with respect to Claim 43 as follows.

With respect to Claim 43, the Examiner rejected Claim 43 for "similar reasons as stated above." Applicant respectfully traverses this rejection and the Examiner's



**Appl. No.** : 09/673,161  
**Filed** : April 16, 2001

characterization of the cited reference. Claim 43 is believed to be patentable for the same reasons stated above. Thus, Applicant respectfully submits that Jennings fails to teach or suggest every element of any of Claim 43, and Applicant respectfully requests that the rejection of Claim 43 be withdrawn.

**6. Claim 32**

Claim 32, which depends from Claim 30 and includes all of the limitations of Claim 30, is believed to be patentable for the same reasons stated above with respect to Claim 30, and because of the additional limitations set forth therein. Since the prior art reference fails to teach or suggest every element of Claim 32, Applicant respectfully requests that the rejection of Claim 32 be withdrawn. In addition, Applicant traverses the Examiner's rejections with respect to Claim 32 as follows.

With respect to Claim 32, the Examiner asserts that Jennings "shows the software program wherein each loadable software code module is individually capable of enabling the execution of one or more tasks including: a) Reporting to the single messaging application functional capabilities of one or more loadable software code modules; b) Supplying text for on-screen menus; c) Creating, editing, displaying messages; d) Converting messages to be sent by the application to a protocol and format required by an external recipient and a conversion of messages received by the application to a protocol and format required by the single messaging application."

Applicant respectfully traverses this rejection and the Examiner's characterization of the cited reference. For example, Jennings does not disclose "wherein each loadable software code module is individually capable of enabling the execution of one or more tasks." In Col. 5, Lines 55-67, cited by the Examiner, Jennings discloses "[t]he communication system provides support to both stationary and portable multimedia enabled phones as well as to the multimedia enabled computer. Over wired links, the communication system supports protocols and languages supported to extend to the Handheld Device Transfer Protocol (HDTP) and the Handheld Device Markup Language (HDML). JAVA enabled phones may also support these protocols and languages. Thus, when accessing the communication system, the JAVA enabled phones provide functionality somewhat comparable to that provided by a multimedia enabled computer." Jennings does not disclose loadable software code modules that are individually capable of enable the execution of one or more tasks. Moreover,

**Appl. No.** : **09/673,161**  
**Filed** : **April 16, 2001**

Jennings does not disclose a software code module that is capable of reporting functional capabilities, supplying text, creating, editing, or displaying messages, or converting messages. Thus, Applicant respectfully submits that Jennings fails to teach or suggest every element of Claim 32, and Applicant respectfully requests that the rejection of Claim 32 be withdrawn.

**7. Claim 37**

With respect to Claim 37, the Examiner rejected Claim 37 for "similar reasons as stated above." Applicant respectfully traverses this rejection and the Examiner's characterization of the cited reference. Claim 37 is believed to be patentable for the same reasons stated above. Thus, Applicant respectfully submits that Jennings fails to teach or suggest every element of any of Claim 37, and Applicant respectfully requests that the rejection of Claim 37 be withdrawn.

**8. Claim 33**

Claim 33, which depends from Claim 32 and includes all of the limitations of Claim 32, is believed to be patentable for the same reasons stated above with respect to Claim 32, and because of the additional limitations set forth therein. Since the prior art reference fails to teach or suggest every element of Claim 33, Applicant respectfully requests that the rejection of Claim 33 be withdrawn. In addition, Applicant traverses the Examiner's rejections with respect to Claim 33 as follows.

With respect to Claim 33, the Examiner asserts that Jennings "shows the software program wherein the loadable software code is object oriented code which creates real objects to execute a task."

Applicant respectfully traverses this rejection and the Examiner's characterization of the cited reference. For example, Jennings does not disclose that "loadable software code is object oriented code" nor does Jennings disclose "loadable software code . . . which creates real objects to execute a task." In Col. 5, Lines 46-54, cited by the Examiner, Jennings discloses "the communications system provides the advantages of both voice communication system devices such as private branch exchanges and data communication system servers such as a web server coupled to the Internet or a server coupled to a company's intranet, local area network (LAN) or wide area network (WAN). The communication system may be constructed to be fully compliant with JAVA enabled phones, JAVA being a software language supported by Internet protocols and

**Appl. No.** : **09/673,161**  
**Filed** : **April 16, 2001**

languages. " Jennings does not disclose loadable software code that is object oriented code which creates real objects to execute a task. Thus, Applicant respectfully submits that Jennings fails to teach or suggest every element of Claim 33, and Applicant respectfully requests that the rejection of Claim 33 be withdrawn.

**9. Claim 42**

With respect to Claim 42, the Examiner rejected Claim 42 for "similar reasons as stated above." Applicant respectfully traverses this rejection and the Examiner's characterization of the cited reference. Claim 42 is believed to be patentable for the same reasons stated above. Thus, Applicant respectfully submits that Jennings fails to teach or suggest every element of any of Claim 42, and Applicant respectfully requests that the rejection of Claim 42 be withdrawn.

**10. Claim 38**

Claim 38, which depends from Claim 37 and includes all of the limitations of Claim 37, is believed to be patentable for the same reasons stated above with respect to Claim 37, and because of the additional limitations set forth therein. Since the prior art reference fails to teach or suggest every element of Claim 38, Applicant respectfully requests that the rejection of Claim 38 be withdrawn. In addition, Applicant traverses the Examiner's rejections with respect to Claim 38 as follows.

With respect to Claim 38, the Examiner rejected Claim 33 for "similar reasons as stated above." Applicant respectfully traverses this rejection and the Examiner's characterization of the cited reference. Claim 38 is believed to be patentable for the same reasons stated above. Thus, Applicant respectfully submits that Jennings fails to teach or suggest every element of any of Claim 38, and Applicant respectfully requests that the rejection of Claim 38 be withdrawn.

**11. Claim 44**

Claim 44, which depends from Claim 43 and includes all of the limitations of Claim 43, is believed to be patentable for the same reasons stated above with respect to Claim 43, and because of the additional limitations set forth therein. Since the prior art reference fails to teach or suggest every element of Claim 44, Applicant respectfully requests that the rejection of Claim 44 be withdrawn. In addition, Applicant traverses the Examiner's rejections with respect to Claim 44 as follows.

**Appl. No.** : **09/673,161**  
**Filed** : **April 16, 2001**

With respect to Claim 44, the Examiner rejected Claim 44 for "similar reasons as stated above." Applicant respectfully traverses this rejection and the Examiner's characterization of the cited reference. Claim 44 is believed to be patentable for the same reasons stated above. Thus, Applicant respectfully submits that Jennings fails to teach or suggest every element of any of Claim 44, and Applicant respectfully requests that the rejection of Claim 44 be withdrawn.

**12. Claim 39**

Claim 39, which depends from Claim 37 and includes all of the limitations of Claim 37, is believed to be patentable for the same reasons stated above with respect to Claim 37, and because of the additional limitations set forth therein. Since the prior art reference fails to teach or suggest every element of Claim 39, Applicant respectfully requests that the rejection of Claim 39 be withdrawn. In addition, Applicant traverses the Examiner's rejections with respect to Claim 39 as follows.

With respect to Claim 39, the Examiner asserts that Jennings "shows the method of manipulating electronically generated messages, wherein the messaging application can handle at least two of the following message types: e-mail, fax, video, page, SMS, voicemail." Applicant respectfully traverses this rejection and the Examiner's characterization of the cited reference. Applicant respectfully submits that Jennings fails to teach or suggest every element of Claim 39, and Applicant respectfully requests that the rejection of Claim 39 be withdrawn.

**C. REJECTION OF CLAIMS 40 and 41 UNDER 35 U.S.C. §103(a)**

The Examiner rejected Claims 40 and 41 under 35 U.S.C. § 103(a) as being unpatentable over Jennings in view of Luzeski.

**1. Claim 40**

Claim 40, which depends from Claim 39 and includes all of the limitations of Claim 39, is believed to be patentable for the same reasons stated above with respect to Claim 39, and because of the additional limitations set forth therein. Since the prior art reference fails to teach or suggest every element of Claim 40, Applicant respectfully requests that the rejection of Claim 40 be withdrawn. In addition, Applicant traverses the Examiner's rejections with respect to Claim 40 as follows.

**Appl. No.** : **09/673,161**  
**Filed** : **April 16, 2001**

With respect to Claim 40, the Examiner asserts that Jennings in combination with Luzeski show "the method of manipulating electronically generated messages wherein code to manipulate each message type is accessed using several databases, each having loadable software code modules, each database individually providing code modules relevant to the execution of one or more of said tasks." The Examiner admits, however, that Jennings "does not specifically show the method of manipulating electronically generated messages wherein code to manipulate each message type is accessed using several databases, each having loadable software code modules, each database individually providing code modules relevant to the execution of one or more of said tasks."

Applicant respectfully traverses this rejection and the Examiner's characterization of the cited references. In order to establish a *prima facie* case of obviousness for a claim, the prior art references must teach or suggest *all* of the claim limitations. M.P.E.P. § 2143, at 2100-124 (Feb. 2003). Thus, to sustain the foregoing rejection of Claim 40, Jennings, alone or in combination with Luzeski, must identically teach or suggest every element of Claim 40. Applicant respectfully submits that Jennings and Luzeski, individually or in combination, fail to teach or suggest every element of any of Claim 40.

For example, Jennings and Luzeski, individually or in combination fail to disclose that "code to manipulate each message type is accessed using several databases." In Col. 5, Lines 46-62, cited by the Examiner, Luzeski discloses "[t]he Web platform includes an applet server (e.g., for providing Java applets to the Web-based client); a Content Manager Application (i.e., an application designed to receive information from content providers, format information into multimedia containers and distribute these containers to the Universal Messaging system via CMC calls); and an NT based Internet server, such as e.g., an IIS server. . . . Web platform also includes or is operatively coupled to a first database (Offer Database) and a second database (Subscription Database), where 'offer' refers to an e-mail based advertisement and 'subscription' refers to 'news' from a content provider. In addition, Web server includes a communications object/address book and a Sockets Interface." Jennings does not disclose that code to manipulate each message is accessed using several databases. Thus, Applicant respectfully submits that Jennings fails to teach or suggest every

Appl. No. : 09/673,161  
Filed : April 16, 2001

element of Claim 40, and Applicant respectfully requests that the rejection of Claim 40 be withdrawn.

**2. Claim 41**

Claim 41, which depends from Claim 40 and includes all of the limitations of Claim 40, is believed to be patentable for the same reasons stated above with respect to Claim 40, and because of the additional limitations set forth therein. Since the prior art reference fails to teach or suggest every element of Claim 41, Applicant respectfully requests that the rejection of Claim 41 be withdrawn. In addition, Applicant traverses the Examiner's rejections with respect to Claim 41 as follows.

With respect to Claim 41, the Examiner rejected Claim 41 for "similar reasons as stated above." Applicant respectfully traverses this rejection and the Examiner's characterization of the cited references. Claim 41 is believed to be patentable for the same reasons stated above. Thus, Applicant respectfully submits that Jennings fails to teach or suggest every element of any of Claim 41, and Applicant respectfully requests that the rejection of Claim 41 be withdrawn.

**D. NEW CLAIMS**

New Claims 47-52 have been added and are believed to be allowable. No new matter is added by these claims. Moreover, Applicants respectfully submit that Luzeski and Jennings, individually or in combination, fail to teach or suggest every element of any of Claims 47-52, and thus, Claims 47-52 are believed to be allowable.

Appl. No. : 09/673,161  
Filed : April 16, 2001

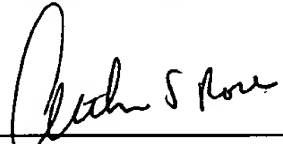
### III. CONCLUSION

In view of the foregoing, the present application is believed to be in condition for allowance, and such allowance is respectfully requested. If further issues remain to be resolved, the Examiner is cordially invited to contact the undersigned such that any remaining issues may be promptly resolved. Also, please charge any additional fees, including any fees for additional extension of time or credit overpayment, to Deposit Account No. 11-1410.

Respectfully submitted,

KNOBBE, MARTENS, OLSON & BEAR, LLP

Dated: 7/14/04

By:   
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